

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION**

**UNITED STATES OF AMERICA,
Plaintiff**

VS.

**0.519 ACRES OF LAND, MORE OR
LESS, SITUATE IN STARR COUNTY,
TEXAS AND DAVID F. REYES, JR., ET
AL.
Defendant**

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7:25-CV-00149

ORIGINAL ANSWER OF STARR COUNTY, TEXAS, et al.

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, Ameida Salinas, Starr County Tax Assessor-Collector, Starr County, Texas, Starr County Farm to Market Road, Starr County Drainage District, Starr County Hospital District, South Texas College Annual Maint, and Rio Grande City Grulla Independent School District (“Taxing Authorities”), and files its Original Answer to United States of America’s Complaint in Condemnation (“Complaint”) and would respectfully show the Court the following:

1. Taxing Authorities admit the allegations in paragraph 1 of the Complaint.
2. Taxing Authorities admit the allegations in paragraph 2 of the Complaint.
3. Taxing Authorities admit the allegations in paragraph 3 of the Complaint.
4. Taxing Authorities admit the allegations in paragraph 4 of the Complaint.
5. Taxing Authorities admit the allegations in paragraph 5 of the Complaint.
6. Taxing Authorities admit the allegations in paragraph 6 of the Complaint.
7. Taxing Authorities are without the requisite knowledge to admit or deny the allegations in paragraph 7 of the Complaint, therefore they are denied.

8. Taxing Authorities admit the allegations in paragraph 8 of the Complaint.
9. Taxing Authorities admit the allegations in paragraph 9 of the Complaint.

WHEREFORE, PREMISES CONSIDERED, Taxing Authorities pray that the Court

- a. recognize the continued existence of and validity of the tax liens securing payment of the taxes, penalties and interest assessed by Taxing Authorities on the subject property;
- b. order that taxes, penalties and interest owing to the Taxing Authorities be paid from the proceeds of the sale after the expenses of preservation of the sale and prior to distribution to any other claimant; and
- c. for all further relief to which Taxing Authorities may be entitled.

Respectfully Submitted,

ATTORNEY FOR TAXING AUTHORITIES

By: /s/ Douglas Steven Bird
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been filed electronically and is to be served by electronic transmission to all parties on the court's electronic mailing matrix on April 23, 2025.

/s/ Douglas Steven Bird

DOUGLAS STEVEN BIRD